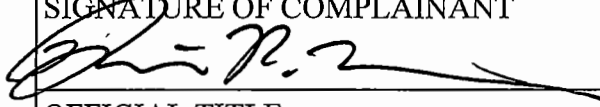



## CRIMINAL COMPLAINT

<b>United States District Court</b>	DISTRICT of ARIZONA
United States of America v. <b>Joel Fuentes</b> DOB: 1981; U.S. Citizen	DOCKET NO.  MAGISTRATE'S CASE NO. <b>20-00244 MJ</b>
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> On or about March 3, 2020, at or near Nogales, in the District of Arizona, <b>Joel Fuentes</b> , did knowing or in reckless disregard that certain aliens, including Yadira Isabel Angel-Escoto, Angel Lopez-Moreno, Rogelio Ramirez-Cuevas, and Alejandra Magdaleno-Diaz, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii).</b>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On March 3, 2020, a Border Patrol agent followed a 2012 Toyota Camry rental vehicle near the international boundary fence in Nogales, Arizona, which he suspected may be transporting narcotics or humans. The agent stopped the vehicle, and as he exited his service vehicle, the Camry sped away at a high rate of speed. The vehicle was later encountered on the side of the road by Santa Cruz County Sheriff's Deputies who helped two individuals out of the trunk of the vehicle as the agent arrived. Deputies apprehended the driver, <b>Joel Fuentes</b> , hiding along with two other individuals two hundred yards from the vehicle. All five passengers who were in the vehicle, including two in the trunk, were determined to be illegal aliens and were identified as Yadira Isabel Angel-Escoto, Angel Lopez-Moreno, Rogelio Ramirez-Cuevas, and Alejandra Magdaleno-Diaz and a juvenile.  The material witnesses, Angel-Escoto, Lopez-Moreno, Ramirez-Cuevas, and Magdaleno-Diaz stated they made arrangements to be smuggled into the U.S. in exchange for money. They crossed into the U.S. with the help of a guide who instructed them to get into the vehicle. Ramirez-Cuevas and Lopez-Moreno were instructed to get into the trunk of the vehicle. Angel-Escoto was in the back seat with the juvenile. She said the driver was driving off road and passing a lot of vehicles and neither she nor the juvenile had their seatbelts on.  Magdaleno-Diaz said she crossed with her juvenile daughter and she sat in the front passenger seat next to the driver and her daughter was in the backseat hidden on the floor. <b>Fuentes</b> told the back seat passengers not to wear their seatbelts and remain hidden. She also stated that <b>Fuentes</b> grabbed her hair and hit her when she did not understand. She stated that when the vehicle came to a stop it was like a small crash because they were going so fast. After the vehicle crashed, <b>Fuentes</b> told them to run.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Yadira Isabel Angel-Escoto, Angel Lopez-Moreno, Rogelio Ramirez-Cuevas, and Alejandra Magdaleno-Diaz	
DETENTION REQUESTED <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i> JAA/drh AUTHORIZED AUSA Josh Ackerman <i>JAA</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> 	DATE March 4, 2020

1) See Federal rules of Criminal Procedure Rules 3 and 54